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IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

**STEVEN RUPP, et al.,**

Plaintiffs,

**v.**

**XAVIER BECERRA, in his official  
capacity as Attorney General of the  
State of California, et al.,**

Defendants.

8:17-cv-00746-JLS-JDE

**DECLARATION OF PETER H.  
CHANG IN SUPPORT OF  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

Date: May 31, 2019  
Time: 10:30 a.m.  
Courtroom: 10A  
Judge: Hon. Josephine L. Staton  
Trial Date: N/A  
Action Filed: April 24, 2017

I, Peter H. Chang, hereby declare and state the following:

1. I am a Deputy Attorney General at the California Department of Justice and serve as counsel to Attorney General Xavier Becerra in the above-titled matter.

2. I made this declaration in support of Defendant's Motion for Summary Judgement. Unless otherwise stated, I have personal knowledge of the facts set forth herein and am competent to testify thereto.

3. Attached are true and accurate copies of the following exhibits:

<b>Exhibit Number</b>	<b>Document Description</b>	<b>Page Number</b>
1	Expert Report and Declaration of John Donohue (Donohue Rpt.)	1-117
2	Expert Report and Declaration of Blake Graham (Graham Rpt.)	118-132
3	Expert Report and Declaration of Michael Mersereau (Mersereau Rpt.)	133-143
4	Expert Report and Declaration of Christopher Colwell (Colwell Rpt.)	144-192
5	Expert Report and Declaration of Lucy Allen (Allen Rpt.)	193-231
6	Updated Table and Appendix B to Expert Report of Lucy Allen (Exhibit 80 to Lucy Allen Deposition)	232-244
7	Rebuttal Expert Report and Declaration of John Donohue	245-254
8	Rebuttal Expert Report and Declaration of Blake Graham	255-262
9	Excerpts of Transcript of the Deposition of John Donohue	263-289
10	Excerpts of Transcript of the Deposition of Blake Graham	290-341
11	Excerpts of Transcript of the Deposition of Michael Mersereau	342-393
12	Excerpts of Transcript of the Deposition of Christopher Colwell	394-435
13	Excerpts of Transcript of the Deposition of Lucy Allen (Allen Dep.)	436-471
14	Excerpts of Transcript of the Deposition of J. Buford Boone (Boone Dep.)	472-583
15	Excerpts of Transcript of the Deposition of Gary Kleck (Kleck Dep.)	584-730
16	Excerpts of Transcript of the Deposition of Stephen Helsley (Helsley Dep.)	731-877

<b>Exhibit Number</b>	<b>Document Description</b>	<b>Page Number</b>
17	Violence Policy Center, <i>Bullet Buttons: The Gun Industry's Attack on California's Assault Weapons Ban</i> (2012)	878-888
18	Defendant's Second Supplemental Response to Plaintiff Troy Willis's First Set of Interrogatories	889-905
19	Excerpt of United States Army, <i>Rifle Marksmanship M16/M4 - Series Weapons</i> (2008)	906-926
20	Brady Center to Prevent Gun Violence, <i>Assault Weapons "Mass Produced Mayhem"</i> (2008)	927-989
21	Excerpts of Bureau of Alcohol, Tobacco, and Firearms, <i>Department of the Treasury Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles</i> (1998)	990-1042
22	Bureau of Alcohol, Tobacco, and Firearms, <i>Report and Recommendation on the Importability of Certain Semiautomatic Rifles</i> (1989) (ATF Rpt.)	1043-1061
23	Christopher S. Koper, et al., <i>Criminal Use of Assault Weapons and High-Capacity Semiautomatic Firearms: an Updated Examination of Local and National Sources</i> , 95 <i>Journal of Urban Health</i> 3, 313-321 (2017) (Koper Article)	1062-1070
24	Colt.com, AR15A4 Advertisement	1071-1071
25	Colt.com, About Colt Rifles	1072-1073
26	David S. Fallis, <i>Data Indicate Drop in High-Capacity Magazines During Federal Gun Ban</i> , <i>Washington Post</i> (Jan. 10, 2013)	1074-1077
27	H.R. Rep. No. 103-489, Public Safety and Recreational Firearms Use Protection Act (H.R. Rep. 103-489)	1078-1123
28	Mark Follman, et al., <i>More than Half of Mass Shooters Used Assault Weapons and High-Capacity Magazines</i> , <i>Mother Jones</i> (Feb. 27, 2013)	1124-1127
29	S.B. 880 Report, 2015-2016 Reg. Sess., Assembly Committee on Public Safety (June 14, 2016) (S.B. 880 Rpt.)	1128-1138
30	U.S. Department of Justice, Office of Justice Programs, National Institute of Justice, <i>Selection and Application Guide 0101.06 to Ballistic-Resistant Body Armor</i> (2014)	1139-1242
31	Violence Policy Center, <i>"Officer Down": Assault Weapons and the War on Law Enforcement</i> (2003)	1243-1271
32	Violence Policy Center, <i>The Militarization of the U.S. Civilian Firearms Market</i> (2011)	1272-1324

Exhibit Number	Document Description	Page Number
33	Violence Policy Center, <i>Firearm Justifiable Homicides and Non-Fatal Self-Defense Gun Use: An Analysis of Federal Bureau of Investigation and National Crime Victimization Survey Data</i> (2018)	1325-1342
34	California Senate Bill 23, 1999 Cal. Stat. ch. 129 (S.B. 23)	1343-1456
35	Guns & Ammo: The New Breed of Assault Rifle, <i>Tomorrow's State-of-the-Art Sporting Rifle</i> (July 1981) (July 1981 Guns & Ammo)	1457-1469
36	Damien Cave and Charlotte Graham-McLay, <i>New Zealand to Ban Military-Style Semiautomatic Guns, Jacinda Arden Says</i> , New York Times (March 20, 2019)	1470-1490
37	Kaylee Hartung, et al., <i>Soneman Douglas shooting. Now parents are urged to be alert</i> , CNN (March 25, 2019)	1491-1502
38	Panagiotis K. Stefanopoulos, et al., <i>Gunshot wounds: A review of ballistics related to penetrating trauma</i> , Journal of Acute Disease, 178-185 (2014)	1503-1510
39	United States Census Bureau, <i>Quick Facts: California</i> (available at <a href="https://www.census.gov/quickfacts/ca">https://www.census.gov/quickfacts/ca</a> )	1511-1515
40	Law Center to Prevent Gun Violence, <i>The California Model: Twenty Years of Putting Safety First</i>	1516-1523
41	U.S. DOJ Press Release, <i>California Man Charged with Conspiring to Provide Material Support to Terrorism and Being 'Straw Purchaser' of Assault Rifles Ultimately Used in San Bernardino, California, Attack</i> (Dec. 17, 2015)	1524-1526
42	Excerpt of National Shooting Sports Foundation, <i>NSSF Report: Modern Sporting Rifle (MSR) Comprehensive Consumer Report</i> (2013)	1527-1535
43	Excerpt of National Shooting Sports Foundation, <i>NSSF Report 2017 Edition: Firearms Retailer Survey Report, Trend Data 2008-2016</i> (2017)	1536-1537
44	FBI Training Division: FBI Academy, Quantico, VA, <i>Executive Summary of Justification for Law Enforcement Partners</i> (May 6, 2014)	1538-1543
45	Violence Policy Center, <i>Key Points About Assault Weapons</i>	1544-1544

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 25, 2019, at San Francisco, California.

/s/ Peter H. Chang

Peter H. Chang  
Deputy Attorney General